

Emma Howard
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Regional Planning Department
320 W. Temple Street, Room 1354
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April 1, 2013

Dear Ms. Howard:

Please consider the following comments to the Draft Significant Ecological Areas Plan and Ordinance:

Re: the Ballona Wetlands SEA

The description of the SEA is unclear; inclusion of a map with the SEA verbal description would help. Also, why does the SEA not include all of Area B around the freshwater marsh?

Why does the SEA include only salt and freshwater wetlands, not brackish wetlands or seasonal wetlands in its description? A vernal pool with fairy shrimp existed on the side of the west bluff above the current freshwater marsh area. Remnants may still exist as the side of the bluff has been restored with native plants in mitigation for the development on top of the bluff.

Why doesn't the SEA include the sides of adjacent bluffs as upland habitat? Until recent development the west bluff was the upland for the wetlands below. The side of the west bluff is still upland habitat for the wetlands.

The SEA could also include the riparian channel that feeds the freshwater marsh, as well as the bluff-side below LMU, which includes springs and a pool on Cabora Rd. Farther east are two small canyons and riparian areas that are also valuable habitat.

As far as wildlife, coyotes have been documented in the SEA, but are not mentioned. Also missing is mention of red harvester ants, short-eared and great horned owls, white-tailed kites, kestrels, and Northern harriers, among the species that are seen in the wetlands and associated uplands.

The SEA does not include the term estuary in its description of the Ballona wetlands area.

SEA Criteria 2011 is confusing as #4, Ballona Wetlands talks about the El Segundo dunes and # 7, El Segundo dunes references San Andreas rift, etc.

General comments on the Draft SEAs:

I am concerned about certain exemptions of projects outside a SEA. Even such projects could have effects on habitat and wildlife within the SEA--for example, use of rodenticides, herbicides and pesticides. There is reference to such detrimental use on page 58, so that native mice did not distribute spores necessary to seedlings and saplings in a managed forest. Policies on such use must be protective of the SEAs and wildlife. Use of such toxic substances should be precluded in and around SEAs.

The Draft states that buffer zones are not needed. However, they may be needed to protect from such toxic or secondary effects as described above.

Landscaping should include a preference or mandate for use of native plants for habitat value and water conservation.

Outdoor lighting in or adjacent to a SEA should be as minimally disruptive as possible as to type of lighting, color, brightness, etc.

For species of special status, up to 50% of their habitat can be impacted by a project, per the Draft. What is the scientific basis for such an opinion? Should different species have different requirements?

As to protection of water resources, use of rodenticides, herbicides, and pesticides in SEAs or adjacent and nearby areas could have significant effects from run-off and blowing in dry weather.

What is the rationale for the differing setbacks for various water bodies?

Is there a difference in areas under city or county jurisdiction? This is not clear to the lay person.

Additional comments:

Whittier Narrows Natural Area is listed as an LA County Open Space Area, with 300 acres of valuable habitat within the larger Whittier Narrows Recreational Area. Is this an SEA? There does not appear to be further discussion of this area.

An issue that the Coastal SEAs and related programs might address, that sea lion pups have been stranding in great numbers this year, starving, the cause as yet unknown.

Thank you.

Leslie Purcell

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